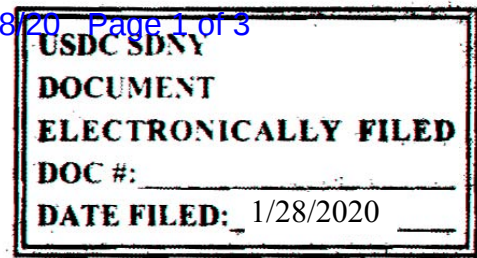


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Via ECF

January 24, 2020

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

*Re: Estate of John P. O'Neill, Sr. v. Al Baraka Inv. & Dev.
Corp., 04-cv-1923 (S.D.N.Y.) (GBD) (SN)*

Dear Judge Netburn:

We represent plaintiffs in the above-referenced matter. We are filing the attached letter in redacted form which was originally sent to Your Honor via email on January 15, 2020. For the reasons discussed in that letter, we respectfully request that the Court allow plaintiffs to file under seal portions of the affidavits of Jerry S. Goldman, Christine I. O'Neill, John P. O'Neill, Jr., and Carol A. O'Neill, submitted in support of plaintiffs' Motion for Class Certification. Defendants do not object to this request.

Respectfully submitted,

/s/ Jerry S. Goldman

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Attorney for the Plaintiffs

Enclosure

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Via Email

January 15, 2020

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007
Netburn_NYSDChambers@nysd.uscourts.gov

Re: *Estate of John P. O'Neill, Sr. v. Al Baraka Inv. & Dev.*
Corp., 04-cv-1923 (S.D.N.Y.) (GBD) (SN)

Dear Judge Netburn:

This letter is filed in accordance with (i) Protective Order, ECF No. 1900, attached hereto; (ii) the parties' stipulation, dated October 21, 2019, attached hereto; and (iii) Your Honor's Individual Rules. The O'Neill Plaintiffs request to file under seal portions of the Affidavits of Jerry S. Goldman, Esq., John P. O'Neill, Jr., Carol A. O'Neill, and Christine I. O'Neill in Support of Plaintiffs' Motion for Class Certification and Related Relief and file the Affidavits in redacted form on the public docket. The Affidavits contain sensitive personal information [REDACTED]

[REDACTED] The request to redact certain sensitive personal information is supported by [REDACTED] strong privacy interest. *See Edwards v. Khalil*, 12-cv-8442, 2016 U.S. Dist. LEXIS 44407, at *3 n.5 (S.D.N.Y. Mar. 31, 2016) (recognizing the appropriateness of filing sensitive personal information under seal).

With this letter, Plaintiffs submit (1) a .pdf of Plaintiffs' Motion for Class Certification and Related Relief, highlighting all proposed redactions in the Affidavits containing sensitive personal information; and (2) a .pdf containing clean copies of the particular pages Plaintiffs' seek to have redacted and filed under seal.

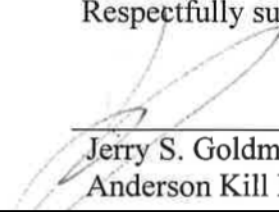
New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA

Anderson Kill P.C.

The Honorable Sarah Netburn
January 15, 2020
Page 2

We thank the Court for its attention to this matter.

Respectfully submitted,

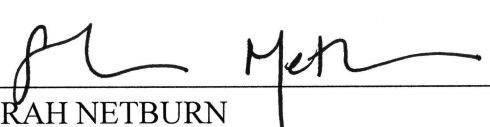


Jerry S. Goldman, Esq.
Anderson Kill P.C.

Plaintiffs' request to file portions of the above-referenced affidavits in support of plaintiffs' Motion for Class Certification under seal is GRANTED pursuant to the parties' October 21, 2019 stipulation.

SO ORDERED.

January 28, 2020
New York, New York



SARAH NETBURN
United States Magistrate Judge

Frederick Goetz, Esq. (via email)
Peter C. Salerno, Esq. (via email)
Amy Rothstein, Esq. (via email)
Steven T. Cottreau, Esq. (via email)